IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

Î PATRICIA D. BACHHOFER, an Individual,)		
Plaintiff,)		
v.)	Case No.	CIV-04-969-F
ÎG. PAUL KULA, M.D., an Individual,)))		
Defendant.)		

PLAINTIFFS' PRELIMINARY WITNESS LIST

Name and Address

- 1. Gary Bachhofer 2105 D. Bloomer Road Marietta, OK 73448
- 2. Patricia Bachhofer 2105 D. Bloomer Road Marietta, OK 73448
- 3. Anna Bursen, M.D. 1104 Walnut Drive Ardmore, OK 73401
- 4. Kasy Fincher
 P.O. Box 2
 Overbrook, OK 73453
- 5. Judy Holden Route 4, Box 194 Lindsay, OK 73052
- 6. G. Paul Kula, M.D. 332 Collier Drive Norman, OK 73069
- 7. Twila McAnally Route 1, Box 299 Marietta, OK 73448
- 8. Sharon Parker

Proposed Testimony

Will testify to effects of Dr. Kula's actions on Patricia Bachhofer and family.

(Deposed) Will testify to facts in Plaintiffs' Complaint

Patricia Bachhofer's treating physician will testify to her treatment of and opinions about Mrs. Bachhofer.

May testify to Drf Kula's pattern of sexual harassment.

Will testify to effects of Dr. Kula's actions on Patricia Bachhofer.

(Deposed) Dr. Kula denies having a sexual relation-Ship with his patient.

Will testify to facts and circumstances surrounding Plaintiff's dealings with Dr. Kula and effects of Dr. Kula's actions on Patricia Bachhofer.

Will testify to Dr.

c/o Norman Regional Hospital Norman, OK

- 9. Jeffrey A. Rother, M.D. 1221 G. Street, N.W. Ardmore, OK 73401
- 10. Steve Washburn
 Investigator
 State of Oklahoma Board
 Of Medical Licensure
 5104 N. Francis, Suite C
 Oklahoma City, OK 73118-6020
- 11. Lisa Whertvine
 DAI
 301 W. Main, Suite 324
 Ardmore, OK 73401

Kula's attitudes toward women and misogynist characteristics.

Patricia Bachhofer's treating physician will testify to his treatment of and opinions about Mrs. Bachhofer.

Will testify to his investigation of Plaintiff's allegations as to Dr. Kula.

Patricia Bachhofer's counselor will testify to treatment of and opinions about Mrs. Bachhofer

s/Charles J. Watts
Charles J. Watts (OBA #9403)
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and

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2005, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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<u>s/Charles J. Watts</u>
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